

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
CHICAGO DIVISION

In re:)
)
DEIFAN A SANTAMARIA) CASE NO.: 18-31554-DDC
)
DEBTOR) JUDGE: DAVID D. CLEARY
)

NOTICE OF FORBEARANCE AGREEMENT DUE TO THE COVID-19 PANDEMIC

Now comes LakeView Loan Servicing, LLC (“Creditor”), by and through undersigned counsel, and hereby submits Notice Forbearance Agreement to the Court of the Debtor's request for mortgage payment forbearance based upon a material financial hardship caused by the COVID-19 pandemic.

The Debtor recently contacted Creditor requesting a forbearance period of six (6) months and has elected to not tender mortgage payments to Creditor that would come due on the mortgage starting May 1, 2020 through October 1, 2020. Creditor, at this time, does not waive any rights to collect the payments that come due during the forbearance period. Furthermore, Creditor does not waive its rights under other applicable nonbankruptcy laws and regulations, including, but not limited to, RESPA, and the right to collect on any post-petition escrow shortage.

Debtor will resume mortgage payments beginning November 1, 2020 and will be required to cure the delinquency created by the forbearance period (“forbearance arrears”).

Creditor does not waive its rights to seek relief from the automatic stay for other reasons other than non-payment of the Mortgage, including, but not limited to, a lapse in insurance coverage or payment of property taxes.

Respectfully submitted,

By: /s/Toni Townsend

Toni Townsend

ARDC #6289370

Counsel for Creditor

McCalla Raymer Leibert Pierce, LLC

1 N. Dearborn Suite 1200

Chicago, IL 60602

In Re:	Bankruptcy Case No.:	18-31554-DDC
	Chapter:	13
Deifan A Santamaria	Judge:	David D. Cleary

CERTIFICATE OF SERVICE

I, Toni Townsend, of McCalla Raymer Leibert Pierce, LLC, 1 N. Dearborn Suite 1200, Chicago, IL 60602, certify:

That I am, and at all times hereinafter mentioned, was more than 18 years of age;

That on the date below, I caused to be served a copy of the within NOTICE OF FORBEARANCE AGREEMENT DUE TO THE COVID-19 PANDEMIC filed in this bankruptcy matter on the following parties at the addresses shown, by regular United States Mail, with proper postage affixed, unless another manner of service is expressly indicated:

Deifan A Santamaria
7746 West Talcott
Chicago, IL 60631

David H Cutler
Cutler & Associates, Ltd.
4131 Main Street
Skokie, IL 60076

(served via ECF Notification)

Marilyn O. Marshall, Trustee
224 South Michigan
Suite 800
Chicago, IL 60604

(served via ECF Notification)

I CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Executed on:	<u>5/29/2020</u>	By:	<u>/s/Toni Townsend</u>
	(date)		Toni Townsend
			Authorized Agent for Creditor